

JULIANA DROUS  
 Attorney at Law SB#92156  
 214 Duboce Avenue  
 San Francisco, California 94103  
 Telephone: (415) 863-3580  
 Facsimile: (415) 255-8631  
 jdrous@msn.com

Attorney for Defendant  
 THOMAS BYNUM

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES,	)	NO. CR-06-00191 WHA
	)	
Plaintiff,	)	
	)	
v.	)	
	)	<b>DECLARATION AND <del>PROPOSED</del></b>
THOMAS BYNUM,	)	<b>ORDER RE: CONDITIONS OF RELEASE</b>
	)	
Defendant.	)	

DECLARATION OF COUNSEL


I, JULIANA DROUS, declare under penalty of perjury as follows:

I represent defendant THOMAS BYNUM on the above referenced case in which he is charged with and has pled guilty to a violation of 18 U.S.C. § 922(g)(1) [illegal possession of a firearm]. Mr. Bynum was granted pre-trial release by the Honorable James Larson. His pre-trial release is supervised by Pretrial Services Officer Anthony Garnados. Mr. Garnados reports that Mr. Bynum has followed all of the conditions of his pre-trial release.


Mr. Bynum's family has rented a cabin in Clearlake, in Lake County, California from July 24, through July 31, 2006 for a family vacation. One of Mr. Bynum's pre-trial release conditions is that he abide by a curfew - he is to be in his parents home from 10:00 p.m. until 6:00 a.m. Mr. Garnados has no objection to Mr. Thomas going on vacation with his family, but has asked that I obtain a court order permitting this trip because of the curfew condition. A.U.S.A. Greg Lowder has also stated that he has no objection to this request.

1 Therefore, I respectfully request that the Court sign the attached order.

2 Executed on July 12, 2006 at San Francisco, California.

3  
4   
5 JULIANA DROUS  
6 Attorney for Defendant  
7 THOMAS BYNUM

8 IT IS SO ORDERED.  
9 DATED: 7/11/06

10   
11 HON. JAMES LARSON  
12 Magistrate Judge

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
Nandor J. Vadas  
United States Magistrate Judge